

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

SARA TAYLOR, individually and on behalf of all others similarly situated,	:	CIVIL ACTION FILE NO. 25-cv-00213
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
KIN INSURANCE, INC.	:	
	:	
Defendant.	:	
	:	
<hr style="width: 45%; margin-left: 0;"/>		

JOINT STATUS REPORT

Plaintiff Sara Taylor and Defendant Kin Insurance, Inc., through counsel, respectfully submit this Joint Status Report pursuant to the Court's July 18, 2025 order.

Status of Written Discovery

Plaintiff served her first set of interrogatories and document requests on June 27, 2025. Defendant served responses and objections on August 11, 2025, along with a production. Plaintiff contends that several responses are incomplete, including the refusal to produce classwide calling records and has requested supplementation. Both parties have exchanged meet-and-confer correspondence and are in the process of setting up a time to discuss these issues.

Defendant served its first set of interrogatories, requests for admission and requests for production on June 27, 2025. Plaintiff served responses and objections on August 11, 2025, including a production of 22 pages of documents. Defendant contends that Plaintiff's responses are incomplete, including her refusal to produce full billing records for the phone number at issue and information regarding her online search history during the relevant time period. Both parties

have exchanged meet and confer correspondence and are in the process of setting up a time to discuss these issues.

Defendant also served several third-party subpoenas and anticipates moving to compel Missie Gossett to appear for her deposition.

Anticipated Depositions

Plaintiff anticipates noticing depositions of Defendant pursuant to Rule 30(b)(6), including topics relating to vendors, dialing systems, calling records, and compliance policies. Plaintiff also anticipates depositions of Kin personnel identified in initial disclosures and discovery responses, including Brian Pogrund.

Defendant previously noticed the deposition of Missie Gossett. Defendant also anticipates noticing the deposition of Plaintiff and James Taylor.

Settlement Conference

At this time, the parties have not agreed to request a settlement conference and do not intend to at this time.

Other Issues

None at this time.

Dated: September 16, 2025

Respectfully submitted,

By: /s/ Anthony I. Paronich
Anthony I. Paronich
PARONICH LAW, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043

(508) 221-1510
anthony@paronichlaw.com

Attorneys for Plaintiff and the Proposed Class

By: /s/ A. Paul Heeringa
A. Paul Heeringa (ARDC # 6288233)
Madelaine A. Newcomb (ARDC #6322725)
MANATT, PHELPS & PHILLIPS LLP
151 N. Franklin Street, Suite 2600
Chicago, Illinois 60606
(312) 529-6300
pheeringa@manatt.com
mnewcomb@manatt.com

Attorneys for Defendant